

EXHIBIT A

Stephen Noviello
 Plaintiff(s)

v.

Gabriel Gorelik / United Settlement Inc
 1st Defendant

Marcel Bluvstein / United Settlement Inc
 2nd Defendant

3rd Defendant

§ In the Justice Court
 Precinct 3, Place 1
 County of Dallas
 State of Texas

2021 APR 30 PM 2:2
 ALBERT E. CEROCHE, J.
 BY
 CLERK

Small Claims Petition

(For all addresses, you **MUST** include number, street, apartment number, city, state, & zip code.)

NOW COMES the above named **Plaintiff(s)** in the above entitled and numbered cause complaining of the above named **Defendant(s)**, who can be notified and/or served with citation at the following address:

1st Defendant's address:

21 West 30th Street 3rd Floor

ADDRESS and APT NO. or SUITE

New York, NY 10001

CITY STATE ZIP

OTHER, if any

Phone FAX

Check to indicate service on Registered Agent

☒ Registered agent for service of 1st Defendant

NAME United States Corporation Agent Inc

ADDRESS 7014 13th Ave Suite 202

CITY STATE ZIP Brooklyn NY 11228

OTHER

Phone FAX

2nd Defendant's address:

21 West 30th Street 3rd Floor

ADDRESS and APT NO. or SUITE

New York, NY 10001

CITY STATE ZIP

OTHER, if any

Phone FAX

Check to indicate service on Registered Agent

☐ Registered agent 2nd Defendant

NAME

ADDRESS

CITY STATE ZIP

OTHER

Phone FAX

3rd Defendant's address:

ADDRESS and APT NO. or SUITE

CITY STATE ZIP

OTHER, if any

Phone FAX

Check to indicate service on Registered Agent

☐ Registered agent 3rd Defendant

NAME

ADDRESS

CITY STATE ZIP

OTHER

Phone FAX

COPY

☐ Defendant(s) is/are justly indebted to Plaintiff(s) for *return of the following* described property:

 _____ valued at \$ _____.

Or

☒ Defendant(s) is/are justly indebted to Plaintiff(s) in the sum of \$ **3,000 Plus court costs** for the following reason(s):

Defendant has repeatedly made illegal robocalls to my cell phone which is registered in the Do Not Call List for the purposes of marketing debt settlement. The calls were unwanted, and were made without any express invitation, permission, or consent.

The Telephone Consumer Protection Act ("TCPA") makes it illegal to solicit sales to cellular devices, via call or text message...

47 U.S.C. § 227(b)(1)(A)(iii) states that:

It shall be unlawful for any person within the United States, or any person outside the United States if the recipient is within the United States... to make any call (other than a call made for emergency purposes or made with the prior express consent of the called party) using any automatic telephone dialing system or an artificial or prerecorded voice... to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call, unless such call is made solely to collect a debt owed to or guaranteed by the United States;

47 U.S.C. § 227(b)(3) provides as follows:

A person or entity may, if otherwise permitted by the laws or rules of court of a State, bring in an appropriate court of that State...an action based on a violation of this subsection or the regulations prescribed under this subsection to enjoin such violation, an action to recover for actual monetary loss from such a violation, or to receive \$500 in damages for each such violation, whichever is greater, or both such actions...

...If the court finds that the defendant willfully or knowingly violated this subsection or the regulations prescribed under this subsection, the court may, in its discretion, increase the amount of the award to an amount equal to not more than 3 times the amount available under subparagraph (B) of this paragraph.

The statute provides that a person who violates the statute is liable for \$500 in damages for each violation. If the court finds that the defendant acted willfully or knowingly (regardless of whether you knew about the TCPA), the court may **triple the damage award**. See 47 U.S.C. § 227(b)(3).

Because I was contacted twice on my cell phone, at a number listed on the national Do Not Call registry, I have reason to believe that defendant willfully or knowingly violated the law, which makes them liable to me for \$3,000.

AND there are no counterclaims existing in favor of Defendant(s) against Plaintiff(s) except: _____

Plaintiff(s) request(s) a judgment for a sum of money against Defendant(s), plus pre-judgment interest, plus reasonable attorney fees, plus all costs of court, plus post-judgment interest at the highest legal rate.

X

 Signature of **Plaintiff**, Plaintiff's authorized agent, **or**

X

 Signature of **Plaintiff's Attorney** (if applicable)

 4545 Fairway Avenue,

 Attorney Address and Suite No.


Dallas TX 75219
 City State Zip

 Attorney City Attorney State Attorney Zip

Phone 214-448-0779 FAX _____

Phone _____ FAX _____

Bar Card # _____

sn  (initial)

I consent to email service of the answer and any other motions or pleadings, to my email address

s.spcventures@gmail.com
Email address